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**MEMO ENDORSED**

June 23, 2020

**VIA CM/ECF**

The Honorable Valerie Caproni  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
Courtroom 443  
40 Foley Square  
New York, NY 10007

Application GRANTED.

SO ORDERED.

Date: 06/24/2020



HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE

Re: *Marino v. Coach, Inc.*, No. 1:16-cv-1122 (VEC)(OTW), and coordinated cases  
1:16-cv-3677, 1:16-cv-3773, and 1:16-cv-5320

Dear Judge Caproni:

We represent defendant Coach, Inc. in the above actions. On May 29, 2020, the Court set a June 19, 2020 deadline to file a joint letter addressing certain issues with the parties' proposed settlement. (*See* May 29, 2020 Order, Dkt. 123.) On June 19, 2020, the parties sought and received an extension of the deadline to file their joint letter to Tuesday, June 23, 2020.

The parties have acquired additional data and prepared responses to each of the Court's questions regarding the class settlement, but have not yet determined how to resolve the potential inconsistency in the class definition set forth in the Settlement Agreement and the Long Form Notice. The parties have conducted several meet and confer teleconferences on this sole remaining issue and are diligently working to reach a resolution. Accordingly, all parties respectfully request that the Court extend the deadline for a response to the Court's May 29, 2020 Order from June 23, 2020, to June 30, 2020.

Respectfully,

s/ Kevin A. Cyrulnik  
Kevin A. Cyrulnik

cc: Counsel of Record (via ECF)